

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

MAINE HUMAN RIGHTS COMMISSION, )  
(for the use of Shirley Carney) and )  
 )  
SHIRLEY CARNEY )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
SUNBURY PRIMARY CARE, P.A. ) Docket No. 1:09-cv-466  
 )  
Defendant. )

**DEFENDANT'S SUPPLEMENTAL EXPERT WITNESS DISCLOSURE**

Defendant Sunbury Primary Care, P.A. ("Sunbury"), hereby files this Supplemental Expert Witness Designation of its expert witness, John W. "Dutch" Stephens, PA-C. Sunbury hereby incorporates by reference its original Expert Witness Designation, dated March 26, 2010.

**John W. "Dutch" Stephens, PA-C  
Corinth Family Medicine  
492 Main Street  
Corinth, ME 04427**

The substance of the facts and opinions to which Mr. Stephens is expected to testify includes, without limitation, Ms. Carney's ability to communicate effectively with him using a combination of lip reading, gestures and writing. Mr. Stephens will give his opinion as to the effectiveness of this method of communication as well as the effectiveness of alternate auxiliary aids or services.

It is further expected that Mr. Stephens will give additional testimony in light of (1) the testimony elicited from Plaintiffs' expert, and (2) the information obtained during discovery.

The grounds for Mr. Stephens' opinions include his professional education, training and experience, as well as many years of treatment of Ms. Carney and knowledge of Ms. Carney's medical history.

Mr. Stephens is a Certified Physician's Assistant and has been with Corinth Family Medicine in Corinth, Maine, providing family medicine for patients of all ages since 1989. A copy of Mr. Stephens' credentials and qualifications is attached to this disclosure as Exhibit 1.

During the last four years, Mr. Stephens has not testified as an expert at trial or by deposition.

Mr. Stephens' billing rate is \$300.00 per hour.

Sunbury reserves the right to amend and/or supplement the foregoing designation as appropriate based on additional information obtained through the discovery process.

Respectfully submitted,



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Dated: April 19, 2010

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Attorney for Defendant,  
Sunbury Primary Care, P.A.



## **John "Dutch" Stephens, PA-C**

John "Dutch" Stephens graduated from the University of Southern Maine and the Albany Medical College Physician Assistant Program. He received his Certification from the National Associate of Certification for Physician Assistants. Dutch has been with Sunbury's Corinth location since 1989 where he provides family medicine for patients of all ages.

